

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

MICHAEL DAVID SILLS and MARY )  
SILLS, )  
 )  
*Plaintiffs*, ) Case No. 3:23-cv-00478  
v. ) JUDGE WILLIAM L. CAMPBELL, JR.  
 ) Magistrate Judge Chip Frenzley  
SOUTHERN BAPTIST CONVENTION, *et* )  
*al.*, )  
 )  
*Defendants* )

**MOTION TO DISMISS**

Defendants, The Southern Baptist Theological Seminary (the “Seminary”) and R. Albert Mohler, Jr. (“Mohler”) (collectively, the “Seminary Defendants”), pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6), move to dismiss the claims asserted against them in the Complaint filed by Plaintiffs, Michael David Sills (“Sills”) and Mary Sills (“Mrs. Sills”) (collectively, the “Plaintiffs”). A Memorandum of Law in support of the Seminary Defendants’ Motion is attached hereto.

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the following Notice of Appearance was emailed to counsel via the Court's Electronic Filing System (ECF) on this the \_\_\_\_ day of July, 2023:

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